

June 10, 2002

Jack Lewis
Lewis Vincennes, Inc.
500 North Fulton Avenue
Evansville, IN 47710-1571

Re: Registered Construction and Operation Status,
083-15672-00039

Dear Mr. Lewis:

The application from Lewis Vincennes, Inc., received on May 28, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following, to be located at 3114 Old Decker Road, Vincennes, Indiana 47591, is classified as registered:

One (1) bakery, producing bread, rolls, and doughnuts at a maximum rate of 5400 pounds per hour, including:

- (a) Two (2) natural gas fired baking ovens, identified as Oven 1 and Oven 2, with maximum rated capacities of 2.835 and 2.363 MMBtu/hr, respectively;
- (b) Two (2) natural gas fired fryers, identified as Fryer 3 and Fryer 4, with maximum rated capacities of 0.94 MMBtu/hr;
- (c) One (1) natural gas fired tunnel oven, identified as Oven 5, with a maximum rated capacity of 3.42 MMBtu/hr;
- (d) One (1) natural gas fired boiler, identified as Boiler 1, with a maximum rated capacity of 2.93 MMBtu/hr; and
- (e) Two (2) flour storage silos, identified as Silo 1 and Silo 2, each with a maximum storage capacity of 240,000 pounds.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-2-4, the PM emissions from Boiler 1 shall be less than 0.60 lb/MMBtu.

- (3) Pursuant to 326 IAC 6-3, the PM emissions from the equipment associated with Silo 1 and Silo 2 shall be limited to less than 8.25 lb/hr.

This registration is a revised registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

SDF

cc: File - Knox County
Knox County Health Department
Air Compliance - Scott Anslinger
Southwest Regional Office
Permit Tracking
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak
Office of Enforcement

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	Lewis Vincennes, Inc.
Address:	3114 Old Decker Road
City:	Vincennes, Indiana 47591
Authorized individual:	Jack Lewis
Phone #:	
Registration #:	083-15672-00039

I hereby certify that Lewis Vincennes, Inc. is still in operation and is in compliance with the requirements of Registration 083-15672-00039.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Renewal of an Existing Registered Source

Source Background and Description

Source Name:	Lewis Vincennes, Inc.
Source Location:	3114 Old Decker Road, Vincennes, Indiana 47591
County:	Knox
Existing Registration No.:	083-7749-00039
Existing Registration Issuance Date:	February 28, 1997
Re-Registration No.:	083-15672-00039
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Lewis Vincennes, Inc. relating to the re-registration of their existing source.

Request

On May 28, 2002, Lewis Vincennes, Inc. submitted an application to re-register their source pursuant to the requirements of 326 IAC 2-5.5. The source consists of:

One (1) bakery, producing bread, rolls, and doughnuts with a maximum rate of 5400 pounds per hour, including:

- (a) Two (2) natural gas fired baking ovens, identified as Oven 1 and Oven 2, with maximum rated capacities of 2.835 and 2.363 MMBtu/hr, respectively;
- (b) Two (2) natural gas fired fryers, identified as Fryer 3 and Fryer 4, with maximum rated capacities of 0.94 MMBtu/hr;
- (c) One (1) natural gas fired tunnel oven, identified as Oven 5, with a maximum rated capacity of 3.42 MMBtu/hr;
- (d) One (1) natural gas fired boiler, identified as Boiler 1, with a maximum rated capacity of 2.93 MMBtu/hr; and
- (e) Two (2) flour storage silos, identified as Silo 1 and Silo 2, each with a maximum storage capacity of 240,000 pounds.

Pursuant to 326 IAC 2-5.5-2(b), any existing source that is not a chrome electroplating source that has a valid registration shall apply for approval under this rule no later than 24 months from the effective date of this rule, or in the case of Lewis Vincennes, Inc., December 25, 2000.

Since the application for the proposed re-registration was received after the applicable date of December 25, 2000, a referral has been sent to enforcement for review.

No changes in equipment have been made, but some of the recipes have been changed such that the unrestricted potential to emit (UPTE) of VOC has changed from 12 tons per year to 19 tons per year. This is determined to be acceptable because the increase in the source VOC unrestricted potential to emit is less than the modification exempt level of 10 tons VOC per year.

After the changes, the UPTE of all applicable source pollutant UPTE are still less than their respective 326 IAC 2-6.1 minor source operating permit (MSOP) levels, but the VOC emissions are greater than the applicable exempt level of 10 tons per year.

Thus, this source shall be granted a registration pursuant to 326 IAC 2-5.5.

Existing Approvals

The source was issued registration 083-7749-00039 on February 28, 1997 and has been operating under this approval ever since.

Enforcement Issue

As previously stated, the Office of Enforcement has been notified of the failure to submit a new application for approval on a timely basis, as required under 326 IAC 2-5.5.

Recommendation

The staff recommends to the Commissioner that the Registration be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT DUE TO THE MODIFICATION:

The following table lists the source unrestricted potential to emit determined based on the maximum throughputs, AP-42 emission factors, EPA publication 453/R92-017, emissions before controls, and 8760 hours of operation.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Production	3.00	3.00	-	-	19.08	-	0.00
Combustion	0.80	0.80	neg.	8.20	0.20	0.60	neg.
Total	3.80	3.80	neg.	8.20	19.28	0.60	neg.

EMISSIONS AFTER CONTROLS:

The emissions before controls equal the emissions after controls.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Production	3.00	3.00	-	-	19.08	-	0.00
Combustion	0.80	0.80	neg.	8.20	0.20	0.60	neg.
Total	3.80	3.80	neg.	8.20	19.28	0.60	neg.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the source PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	3.80
PM-10	3.80
SO ₂	neg.
VOC	19.28
CO	0.60
NO _x	8.20

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

All criteria pollutant UPTe are less than 25 tons/yr, no single HAP emissions exceed 10 tons/yr, and the combined HAP emissions do not exceed 25 tons/yr. However, the VOC emissions exceed the applicable exempt level of 10 tons per year. Therefore, the source shall still be permitted via a registration pursuant to 326 IAC 2-5.5.

County Attainment Status

The source is located in Knox County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, the

VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Knox County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.

- (b) Knox County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	3.80	3.80	neg.	8.20	19.28	0.60	neg.	neg.

PSD Levels	250	250	250	250	250	250	-	-
Part 70 Levels	-	100	100	100	100	100	10	25

- (a) This new source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This new source is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

Federal Rule Applicability

New Source Performance Standards (NSPS):

40 CFR 60, Subpart Dc does not apply to the boiler because the capacity of the boiler is less than the applicable capacity of 10 MMBtu/hr.

There are no other New Source Performance Standards (NSPS) 40 CFR 60 that apply to the source.

National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that apply to this source.

State Rule Applicability

Entire State Rule Applicability:

326 IAC 1-6-3 (Preventive Maintenance Plan):

The proposed source is not required to have a preventive maintenance plan for the emission units and control devices of the source.

326 IAC 2-4.1 (HAP Major Sources)

This source is not subject to the requirements of 326 IAC 2-4.1 because no single hazardous air pollutant (HAP) emissions exceed 10 tons per year, and the combined HAP emissions are less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not in one of the listed source categories, and does not emit more than 100 tons per year of any regulated pollutants.

326 IAC 5-1-2 (Opacity Limitations)

Opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

Individual State Rule Applicability

326 IAC 6-2-4 (Particulate Emissions Limitations for Source of Indirect Heating):

Pursuant to 326 IAC 6-2-4, the PM emissions from the natural gas fired boiler, rated at 2.93 MMBtu/hr, shall not exceed 0.60 lb/MMBtu.

326 IAC 6-3 (Process Operations):

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the equipment associated with Silo 1 and Silo 2 for a maximum process weight rate of 2.842 tons per hour, shall be 8.25 lb/hr.

$$E = 4.10 * P^{0.67} = (4.10) * [2.842]^{0.67} = 8.25 \text{ lb/hr}$$

where: E = rate of emission in pounds per hour,
P = process weight in tons per hour

The original registration limited the flour throughput to 5.7 lb/hr to keep the PM emissions to below the construction permit level of 25 tons per year. However, it is now determined that the 326 IAC 6-3 limit is an hourly limit that is independent of an annual rate. Thus, no throughput limit is required of the source. This limit shall therefore be removed from the approval.

326 IAC 8-1-6 (State BACT Requirements):

Although there are no other Article 8 rules that apply to the source, 326 IAC 8-1-6 does not apply because the source potential VOC emissions are less than the applicable level of 25 tons per year.

Conclusion

This bakery shall be operated according to the requirements specified in Registration No. **083-15672-00039**.